

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

FEDERAL DEPOSIT INSURANCE CORPORATION  
AS RECEIVER OF R-G PREMIER BANK OF PUERTO  
RICO

Plaintiff,

v.

VICTOR J. GALÁN-ALVAREZ, et al.

Defendants

Civil No. 12-1029

**ADDENDUM TO JOINT PROPOSED DISCOVERY PLAN PURSUANT TO  
RULE 26(f)**

Counsel for all parties in the above-captioned matter have agreed to the following addendum to the Joint Proposed Discovery Plan Pursuant to Rule 26(f) (ECF No. 83) (“Joint Discovery Plan”) concerning the production of electronically stored information (“ESI”), which they hereby submit for this Court’s consideration:<sup>1</sup>

**A. Form of Production for Email**

All electronic email from Windows-Based ESI (“WEST”) shall be produced in multi-page Group IV TIFF file format or .TIF file format (or, if use of that format is not possible, in single-page PDF file format) complete with full text extracts and the

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<sup>1</sup> The submission of this Addendum to the Discovery Plan is not intended as an affirmation by Defendants of the Discovery Plan, portions of which are the subject of motions before the Court.

following fields of metadata (to the extent such fields are available):

1. Custodian (Name of Custodian from which file is being produced);
2. Other Custodians (Name(s) of custodian(s) who had exact copy of message before de-duplication);
3. Author (FROM field);
4. CC;
5. BCC;
6. Recipient (TO field);
7. Subject;
8. MD5 Hash Value or Equivalent;
9. Date Sent (Date the email was sent);
10. Date Received (Date the file was received);
11. Time Sent (Time the email was received);
12. Time Received (Time the email was received);
13. File Type (Application used to create the file);
14. Page Count;
15. File Ext (Extension for the file);
16. PST Name;
17. Body Text (Extracted text);
18. Bates Begin (Beginning Production Number);
19. Bates End (Ending Production Number);
20. Attach Begin (Beginning Attachment Range Number);
21. Attach End (Ending Attachment Range Number).

Electronic mail shall be produced along with attachments to the extent the message

and/or any attachment is responsive, relevant and not privileged. As a general matter, subject to specific review, a message and its attachments(s) shall not be withheld from production based on the fact that one or more attachments are privileged, irrelevant or non-responsive. To the extent the message and/or one or more attachments is privileged or non-responsive, the responsive, non-privileged documents shall be produced along with placeholders indicating whether the individual record was withheld as non-responsive or privileged.

**B. Form of Production for Other WESI**

All other WESI (including attachments to electronic mail) shall be produced in multi-page Group IV TIFF or .TIF file format (or, if use of that format is not possible, in PDF format) complete with full text extracts and the following fields of metadata (to the extent such fields are available):

1. Custodian (Name of Custodian from which file is being produced);
2. Other Custodians (Name(s) of custodian(s) who had exact copy of file before de-duplication);
3. Author;
4. Doc Title (Title of file from properties);
5. Doc Subject (Subject of file from properties);
6. Created Date (Date the file was created);
7. Created Time (Time the file was created);
8. Last Modified Date (Date the file was last modified);
9. Last Modified Time (Time the file was last modified);
10. Last Saved By (Name of user who last saved the file);
11. File Type (Application used to create the file);

12. Doc Type;
13. Page Count;
14. File Ext (Extension for the file);
15. File Path (Full path of the original location where the file was located);
16. MD5 Hash (MD5 hash value of the original native file);
17. Body Text (OCR for paper data or Extracted text for all ESI);
18. Bates Begin (Beginning Production Number);
19. Bates End (Ending Production Number);
20. Attach Begin (Beginning Attachment Range Number);
21. Attach End (Ending Attachment Range Number).

**C. Form of Production for Spreadsheets and Other Documents**

All ESI in the form of spreadsheets other documents with limited accessibility in the Group IV TIFF format shall be produced in native format in addition to the format set forth above. Each spreadsheet will be renamed with an appropriate Bates number which shall also be reflected on a placeholder in the image production and load files.

**D. Load Files**

All WESI and Department-Based WESI shall be produced along with a Concordance load file indicating Bates numbers and document breaks. Metadata shall be produced in Concordance DAT file format or XML format and extracted full text shall be provided in TXT file format at the document level. Non-Windows-Based Applications and Data shall be subject to the same production requirements to the extent technically and legally feasible.

**E. Data Culling**

The following file types shall be processed for production:

<b>Extension</b>	<b>File Type Description</b>
cab	Windows cabinet (data will be extracted and container file discarded)
csv	Comma Separated Values file
dat	Data file
dbx	Outlook Express E-mail Folder
doc	Microsoft Word
docm	Microsoft Word Template
docx	Microsoft Word 2007
dxl	Lotus Notes Message File
efax	Electronic fax documents
email	Outlook Express E-mail Message
eml	Outlook Express Saved Mail Messages files
emlx	Apple Mail email message
htm	Web based Hypertext Markup Language File
html	Web based Hypertext Markup Language File
ics	Calendar items in Apple, Mozilla and Google
key	Apple Keynote presentation
maildb	MSN Mail file
mbox	Unix MAC file mailbox
mlm	Novell GroupWise saved email message file
mdb	Microsoft Access Database
mht	Multipurpose Internet Mail Extension
mim	Multipurpose Internet Mail Extension
mpp	Microsoft Project
msg	Outlook Mail Message
nsf	Lotus Notes (data will be extracted and container file discarded)
ost	Microsoft Outlook Offline folder file (data will be converted, extracted, and container file discarded)
pbx	Outlook Express message folder file
pdf	Portable Document Format File
pop	PopMail messages file
pps	Microsoft PowerPoint Show file
ppt	Microsoft PowerPoint file
pptx	Microsoft PowerPoint 2007
pst	Microsoft Outlook personal folder file (data will be extracted and container file discarded)
rar	WinRAR compressed archive (data will be extracted and container file discarded)
rtf	Rich Text Format

<b>Extension</b>	<b>File Type Description</b>
tif	Tagged Image Format
txt	Plain Text File
wks	Works Spreadsheet
wpd	Corel WordPerfect
wps	Microsoft Works Word Processor Document
xls	Microsoft Excel
xlsx	Microsoft Excel 2007
xml	Extensible Markup Language file
xps	XML Paper Specification
zip	Zipped Compressed File (data will be extracted and container file discarded)
zipx	Extended Zipped Compressed File (data will be extracted and container file discarded)

#### **F. Duplicates**

To the extent that exact duplicate documents (based on MD5 or SHA-1 hash values at the document level) reside within a party's data set, each party shall produce only a single copy of a responsive document. This de-duping should be done only on exact duplicative documents, and only documents where the main parent document and the attachments are exactly the same will be considered exact duplicates.

#### **G. Bates Scheme and Confidentiality Designations**

All documents produced by the Plaintiff shall include a Bates stamp on each page produced, numbered sequentially from FDIC-RGP-0000001.

The confidentiality status of all documents shall be governed by the Stipulated Protective Order (ECF No. 48), entered on April 4, 2012. In accordance with the Stipulated Protective Order, any document designated as Confidential Material shall be marked with the legend "CONFIDENTIAL" on the first page of the document.

#### **H. Encryption**

All encryption shall be made using TrueCrypt software.

## **I. Mechanics of Production Under the Joint Discovery Plan**

Under Phase III of the Category A production in the Joint Discovery Plan, the Plaintiff shall produce one (1) electronic copy of the Category A production to the Defendants. Defendants shall copy and distribute the production among themselves. Unless otherwise mutually agreed by the parties, hard copy documents will not be produced under Category A.

As described in Phase C of the Category B Production in the Joint Discovery Plan, the Plaintiff shall provide the Defendants with the means to remotely access and review all Category B ESI. The Plaintiff will provide access to each group of Defendants who mutually share counsel for up to ten (10) reviewers.

Under Phase E of the Category B Production in the Joint Discovery Plan, the Plaintiff shall produce one (1) electronic copy of the Category B production to the Defendants. The Defendants shall copy and distribute the production among themselves. Unless otherwise mutually agreed by the parties, hard copy documents will not be produced under Category B.

By agreement of the parties, productions may be made on a rolling basis under either the Category A or Category B productions of the Joint Discovery Plan.

The parties agree and acknowledge that production by the Plaintiff under either Category A and/or Category B of the Joint Discovery Plan does not waive the rights of the Plaintiff to seek compensation for the costs of such production through an order from the Court. The parties also agree and acknowledge that nothing in this Addendum obligates Defendants to pay any costs of review, production and/or copying. For the avoidance of doubt, the Addendum addresses only technical aspects of the production

and is neutral with regard to costs.



**AGREED AND APPROVED:**

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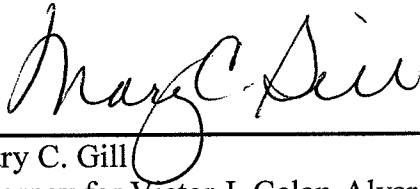
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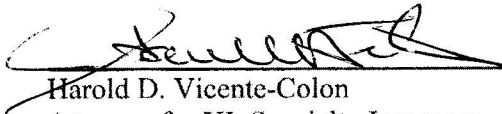
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